

DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: AVINASH SURAJBALI

MOS TAX:

X:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in <u>limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST MOS ARISING FROM AN INCIDENT ON 6/14/11:

1. DEPARTMENTAL RULES VIOLATION-FAIL TO TAKE/MAKE REPORT PENALTY: 'A' CD-ISSUED

CASE CLOSED ON 09/20/2012.

Disclosure #2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST MOS ARISING FROM AN INCIDENT ON 2/6/12:

 DEPARTMENTAL RULES VIOLATION-TRAFFIC VIOLATION BUREAU- NON-APPEARANCE

CLOSED ON 3/22/12

Disclosure #3:

MOS IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTIONS:

- CHAN DAVIS V. CITY OF NEW YORK, ET AL, 12-CV-12715, FILED IN KINGS COUNTY SUPREME COURT
- TAMIKA STEWART AND BERNARD WASHINGTON V. CITY OF NEW YORK, ET AL, 15-CV-03389, FILED IN THE EASTERN DISTRICT.

Eric Gonzalez District Attorney Kings County